

91. The economic shortfall may affect syndicators before it hits broadcasters. "The television syndication market has been radically changed by regulatory and market forces. For example, the imposition of a requirement that television broadcasters must carry educational programming for at least three hours each week may hurt syndicators as networks attempt to create such programming themselves" (Freeman 26).

92. In a recent panel on producing children's shows, syndicators bemoaned the state of syndication under the FCC-mandated rules. Michael Eigner of Tribune Broadcasting pointed out:

"[It's] becoming a lot harder to get ad dollars [for such programming]" (Communications Daily 28 February 1998).

93. Eigner cited cable competition and low ratings for the decreased revenue, and predicted that the lackluster financial support for children's educational programming would translate into more stations with fewer kids' shows that meet FCC requirements (*Communications Daily* 28 February 1998). Although Tribune kids' shows have been profitable in the past, Eigner predicts that:

It's going to be harder and harder to maintain that profitability because competition is so intense (Communications Daily 28 February 1998).

94. Advertising revenues are paramount to successful programming for producers and broadcasters. Regardless of educational intent or marketing strategy, without advertising support, quality programming--children's or otherwise-- will be sacrificed. According to Shelley Hirsh, president of Summit Media:

Lack of ads makes it a lot tougher to provide good children's shows (Communications Daily 28 February 1998).

95. Despite dismal financial forecasting, the three-hour rule has already translated into the production of FCC-friendly shows, designed specifically to cater to the guidelines imposed on broadcasters. "Generally, there are 25 to 30 new kids stamps and weeklies on display at NATPE. This year [1997], in addition to the general interest kids shows, there will be no fewer than 15 that syndicators say are specifically designed to help TV stations fulfill the new three-hour quotas mandated by Congress and the FCC" (Freeman 27).

SOCIAL IMPACT

96. Television is the most pervasive and influential medium to which children are exposed. "By the time American children leave high school, they have spent more than 20,000 hours watching television -- almost double the 11,000 hours they have endured in the classroom." (*The Economist* 65).

97. The framers of the CTA recognized the influence of the medium on child development, and Congress supported the authors' assessment of how television can impact children:

Television can assist children in to learn important information, skills, values, and behavior, while entertaining them and exciting their curiosity to learn about the world around them (FCC 96-335).

98. In studies chronicling the impact of educational and entertainment programming, researchers have been able to draw conclusions concerning the social effects on children. In a study conducted in the late 1950s, researcher Hilde Himmelwit concluded that "television at its best can implant information, stimulate interest, and help the child to be less prejudiced and more tolerant. Television at its worst can lead to a reduction in knowledge, deter children from other worthwhile activities, and implant stereotypical value judgments" (Bryant 22-3).

SECTION V

ANALYSIS

99. Based on the information provided within this document, it is imperative that the Commission review ascertainment requirements for children's educational programming. By involving the community in evaluating and shaping in the local station's response to FCC regulation, we are ensuring that the needs of children are being met over the airwaves.

100. Section I of the proposal explores the lack of the public interest represented in broadcast programming. By showcasing the uneven support of the Children's Television Act, as well as the demise ascertainment

requirements, this section highlights the economic and political issues in children's television.

101. Section II illustrates the complicated histories of both children's programming and ascertainment requirements. Although presented separately, the two share threads of commerce before community in the broadcast industry.

102. Section III offers a wide array of comments and perspectives from industry professionals, political figures and long-time advocates. In both sets of comments, the problematic nature of broadcasting is evident. It is nearly impossible to serve the needs of the community without enlisting representatives on a local level.

103. Section IV presents an objective assessment of the impact this proposed legislation will have on broadcasters, local affiliates, political groups, community representatives, and most crucially, children.

SECTION VI

CONCLUSION

104. In compliance with this notice, it is hereby ordered that local stations institute ascertainment requirements for children's educational/instructional programming, as outlined by the Federal Communications Commission, under amendments made to the Children's Television Act of 1990.

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